

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ANNE SQUADRON, ANNE STRICKLAND
SQUADRON, SETH SQUADRON, ELIZABETH
SQUADRON, DANIEL SQUADRON, WILLIAM
SQUADRON, DEBRA LAGAPA, RICHARD
SQUADRON, THEODOSIA PRICE, DIANE
SQUADRON, THOMAS SHEA, PETER GOLD,
CAROL GOLD, SARAH D. GOLD, SWING
HARRE, DAVID HARRE, VANESSA N. GANG,
ANNA ROTHWELL, ROBERT VAS DIAS and
MARGARET BUTCHER,

Defendants.

Adv. Pro. No. 10-05164 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including January 30, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York
December 3, 2014

By: /s/ Howard L. Simon
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*Special Counsel to Irving H. Picard, Trustee for
the SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

Dated: New York, New York
December 2, 2014

By: /s/ Gabrielle J. Pretto
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